

REMARKS

Applicant hereby responds to the Office Action of August 10, 2006. Claims 1-6, 8-15, 17-25, 27 and 28 are pending in the above-referenced patent application. All of the claims were rejected. Claims 1-3, 6, 8-12, 15, 17-22, 25, 27 and 28 were rejected under 35 U.S.C. 102(e) as being anticipated by USPN 6,133,847 to Yang (hereinafter "Yang"). Claims 4, 5, 13, 14, 23 and 24 were rejected under 35 U.S.C. 103(a) as being unpatentable over USPN 6,466,233 in view of Official Notice by the Examiner.

Claims 1, 2, 4, 8, 9, 10, 11, 13, 17, 18-21, 23, 27 and 28 have been amended to further clarify the claimed limitations. New matter has not been added. All of the rejections are respectfully traversed.

INTERVIEW SUMMARY

Applicant wishes to thank the Examiner for courtesies shown during the telephone interview of October 10, 2006. The following is a summary of the points discussed in the interview. Independent claims, and in particular Claim 1, were discussed in view of the cited reference Yang (USPN 6,133,847). Applicant argued that there is no disclosure in Yang of a case in which initially information is obtained from the appliances to generate a top page that includes links for access to user interface information in the appliances, such that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance,

as claimed. Applicant further argued that there is no disclosure in Yang of a case where the remote control 100 presents to the user a top page with links for access to control programs contained in the appliances 150 themselves, wherein when the user selects an appliance link in the top page, the remote control 100 downloads the corresponding control program from the appliance itself, as claimed. Applicant further argued that Yang, col. 8, lines 10-17, referred to by the Examiner, does not disclose that the device information in each device includes a user control interface description for user interaction with that device, such that when a link in the top page user interface description is user activated, the control interface description in the corresponding device is accessed using the activated link to obtain device information and generate a device user interface for user interaction with that corresponding device, as claimed. Agreement was not reached.

ARGUMENTS

Rejection of Claims 1-3, 6, 8-12, 15, 17-22, 25, 27 and 28 under 35 U.S.C. 102(e) as being anticipated by Yang (USPN 6,133,847) is respectfully traversed because for at least the following reasons, Yang does not disclose all of the claimed limitations.

Yang is directed to a remote control device is that is able to be programmed after initial manufacture to accommodate the control of additional apparatuses. The remote control device includes a multi-functional, interchangeable user interface where the interface is modified such that it is able to control the functions of a variety of different types of apparatuses. (Abstract).

As per Claim 1, it is respectfully submitted that Yang does not disclose: obtaining information from one or more of the devices currently connected to the network, wherein each device contains device information including user control interface description for user interaction with that device; generating a top page user interface description based at least on the obtained device information, the top page user interface description including one or more references associated with the device information in each of said devices currently connected to the network, such that each reference in the top page user interface description includes at least one electronic link providing direct access from the top page user interface description to said device information contained in said devices currently connected to the network; and when a link in the top page user interface description is user selected, using the selected link to access the associated selected and use the control interface description contained in the selected device to generate a device user interface for user interaction with that selected device, as claimed.

There is no disclosure in Yang of a case in which initially information is obtained from the appliances to generate a top page that includes links for direct access to user interface information in the devices, such that when a link in the top page is user selected the link is used to access the user interface description contained in the associated device to generate a user interface for user interaction with the selected device, as claimed herein. Further, there is no disclosure in Yang of a case where the remote control 100 presents to the user a top page with links for direct access to any control programs in appliances 150. Yang does not disclose: a user

selecting an appliance link in a top page, and the remote control 100 downloading control programs from the appliance upon selection of a link, as claimed herein. Indeed, Yang col. 8, lines 19-24, lines 59-66, teaches away from such claimed limitations.

Not only does Yang not disclose generating a top page user interface description, in Yang there is no step of presenting to a user a top page with one or more links that provide direct access to control programs contained in the appliances themselves (and there is no need for such a feature in Yang). Even if based on the Examiner's interpretation Yang's remote control provides a user with icons representing appliances (which Applicant traverses), such icons do not form a top page including electronic links that provide direct access to device information contained in the appliances, as claimed herein, wherein each link itself is used to access device information contained in an associated appliance. For at least these reasons, it is respectfully requested that rejection of Claim 1, and all claims dependent therefrom, be withdrawn.

Claims 10 and 20 were rejected for the same reasons as rejection of Claim 1, and as such rejection of Claims 10, 20, and all claims dependent therefrom should be withdrawn for at least the reasons provided in relation to Claim 1.

As per Claim 2, it is respectfully submitted that Yang does not disclose that: "a link comprises a pointer from the top page user interface description to at least the device information in an associated device," as required by Claim 2. By contrast, in col. 8, lines 17-24 (relied on by

the Examiner), Yang states: “In order to control a particular appliance with the remote control device, the user would select the icon that represents the particular appliance. The selection of the icon would provide a control signal to the functions interface and the functions interface would then access the control software for that appliance from memory and configure the user interface function control panel so that it would be configured to control the appliance selected.”

As such, there is no disclosure of electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in the above passage or elsewhere in Yang of a link for direct access for control program in an appliance. Indeed, in the above passage Yang states that the functions interface accesses the control software for that appliance from the remote control memory, not from the appliance. As such, Yang does not disclose a link that comprises a pointer from the top page user interface description to at least the information in a corresponding device, as claimed herein.

Claims 11 and 21 were rejected for the same reasons as rejection of Claim 2, and as such rejection of Claims 11 and 21 should be withdrawn for at least the reasons provided in relation to Claim 2.

As per Claim 3, it is respectfully submitted that Yang does not disclose the steps of: “generating the top page user interface description such that the user interface description further includes device data corresponding to each device based on the information obtained from each

device,” as required by Claim 3. As discussed in relation to Claim 1, Yang does not disclose a top page user interface description as claimed. By contrast, in col. 8, lines 10-14 (relied on by the Examiner), Yang states: “In the network application described above, and for any application where multiple appliances to be controlled are located in the same room, the remote control device could receive an interface control signal for each of the appliances on the network or in the room.”

There is no mention in the above passage of generating a top page user interface description that includes device data corresponding to each device based on the information obtained from each device. The interface control signal in Yang is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory (Yang, col. 2, lines 27-30). This has nothing to do with generating the top page user interface description such that the user interface description further includes device data corresponding to each device based on the information obtained from each device, as claimed.

Claims 12 and 22 were rejected for the same reasons as rejection of Claim 3, and as such rejection of Claims 12 and 22 should be withdrawn for at least the reasons provided in relation to Claim 3.

As per Claim 8, it is respectfully submitted that Yang (col. 2, lines 27-33 and col. 8, lines 17-24, relied on by the Examiner) does not disclose: “generating the top page user interface description such that each link in the top page user interface description provides direct access to at least the user control interface description in each associated device.” As discussed above, in Yang there is no disclosure of electronic links to control programs, as claimed herein. Yang’s icons are not links as claimed herein. Further, there is no mention in Yang of a link for direct access for control program in an appliance. Yang does not disclose a link that provides direct access to at least the user control interface description in each associated device, as claimed herein. Further, the interface control signal in Yang, col. 2, lines 27-30, is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory. The control signal is not a link that provides direct access to the control program in appliance, as claimed herein. For at least these reasons, rejection of Claim 8 should be withdrawn.

Claims 17 and 27 were rejected for the same reasons as rejection of Claim 8, and as such rejection of Claims 17 and 27 should be withdrawn for at least the reasons provided in relation to Claim 8.

As per Claim 9, Yang (col. 2, lines 27-33 and col. 8, lines 17-24, relied on by the Examiner) does not disclose: “generating the top page user interface description such that the top page user interface description further includes device data corresponding to each device based

on the information obtained from each device, the device data providing an electronic link to the user control interface description in each device, such that when the link in the top page is user activated the activated link is used to access the associated device and retrieve control interface description contained in the associated device to generate and display a device user interface based on the retrieved control interface description, for user interaction with that associated device.” As discussed above, in col. 8, lines 17-24 (or elsewhere) in Yang there is no disclosure of electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in Yang of a link for direct access for control program in an appliance. Yang does not disclose a link that provides direct access to at least the user control interface description in each corresponding device, as claimed herein. Further, the interface control signal in Yang, col. 2, lines 27-30, is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory. The control signal is not a link that provides direct access to the control program in appliance, as claimed herein.

There is no case in Yang wherein when a link in the top page user interface description is user activated, the control interface description in the associated device is accessed using the activated link to obtain device information and generate a device user interface for user interaction with that corresponding device, as claimed herein.

Claims 18 and 28 were rejected for the same reasons as rejection of Claim 9, and as such rejection of Claims 18 and 28 should be withdrawn for at least the reasons provided in relation to Claim 9.

As per Claim 19, it is respectfully submitted that Yang does not disclose: “generating at least one top page user interface by: using each link in the top page user interface description to access the device information in each associated device, and generating the top page user interface including device data corresponding to each device using the accessed information in each device.” In Yang, col. 2, lines 10-14 (relied on by the Examiner), there is no mention of generating a top page user interface description that includes device data corresponding to each device based on the information obtained from each device. The interface control signal in Yang is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory (Yang, col. 2, lines 27-30). This has nothing to do with generating at least one top page user interface by: using each link in the top page user interface description to access the device information in each corresponding device, and generating the top page user interface including device data corresponding to each device using the accessed information in each device, as claimed.

Further, in col. 8, lines 10-14 and 17-24 (relied on by the Examiner), Yang does not disclose electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in Yang of a link for direct access for control program in an

appliance. Yang does not disclose a link that provides direct access to at least the user control interface description in each corresponding device, as claimed herein. Further, the interface control signal in Yang, col. 2, lines 27-30, is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory. The control signal is not a link that provides direct access to the control program in appliance, as claimed herein.

In Yang there is no step of presenting to a user a top page with a set of links that provide direct access to control programs contained in the appliances themselves. There is no case in Yang wherein when a link in the top page user interface description is user activated, the control interface description in the associated device is accessed using the activated link to obtain device information and generate a device user interface for user interaction with that corresponding device, as claimed herein. Further, Yang makes no mention of a top page user interface description from which a top page user interface can be generated using links in the top page user interface description to obtain device information.

Rejection of Claims 4, 5, 13, 14, 23 and 24 under 35 U.S.C. 103(a) as being unpatentable over USPN 6,466,233 to Yang in view of Official Notice by the Examiner, is respectfully traversed because no prima facie case of obviousness has been established.

Applicant again points out that USPN 6,466,233 (cited by the Examiner as being invented by Yang) is indeed invented by Mitani, not to Yang. Applicant assumes that the Examiner intended to refer to USPN 6,133,847 to Yang as in the rejections under 35 U.S.C. 102(e), and as such Applicant responds accordingly. If that is not the intention of the Examiner, Applicant respectfully requests that the Examiner clarify the matter such that Applicant can respond accordingly, and Applicant reserves the right to provide further arguments/evidence in support of allowance of the claims. Applicant respectfully notes that the Examiner has improperly used an omnibus rejection to reject Claims 4, 5, 13, 14, 23 and 24.

As per Claims 4, 5, 13, 14, 23 and 24, as the Examiner also states, Yang does not disclose the steps of associating a hyper-text link with the device information in each of said devices currently connected to the network, such that each hyper-text link provides access from the top page user interface description to the device information in a corresponding device, as claimed herein. Further, as the Examiner also states, Yang does not disclose that device information in each device comprises an HTML page for user interaction with and/or control of that device, as claimed herein.

The Examiner relies on Official Notice for the proposition that using hyper-text links and HTML pages as claimed would have been obvious to one of ordinary skill in the art. The Examiner further contends that it would have been obvious to one of ordinary skill in the art to include hyper-text links and HTML pages in Yang to control the appliances remotely from the

Internet via HTTP protocol.

However, there is no motivation or suggestion in Yang to modify it as the Examiner suggests. Further, as discussed above, Yang does not disclose links for direct access to control programs in appliances. As such, there is no reason or motivation to include hyper-text links in Yang. Further, in Yang, there is no mention, motivation or suggestion about Internet or HTTP protocol or suggestion to utilize such protocols in the remote control.

Yang does not disclose a user interface description that includes links to appliances, wherein when the link for a device is selected by the user, the selected link is used to access control program information stored in the device to obtain the user interface for the selected device for the user to control the device. There is no top page user interface description in Yang with links for access to appliances, wherein when the link is selected by the user, the link is used to access the appliance and access the user interface (i.e., control program) for the appliance.

Applicant traverses the Official Notice taken by the Examiner in its entirety. Applicant traverses the Official Notice taken by the Examiner for the proposition that using hyper-text links and HTML pages as claimed would have been obvious to one of ordinary skill in the art. The Examiner contended that it would have been obvious to one of ordinary skill in the art to include hyper-text links and HTML pages in Yang to control the appliances remotely from the Internet via HTTP protocol. Applicant further traverses the Official Notice because not only Yang does

not disclose such limitations, but the prior art does not disclose such limitations as claimed. If the claims are once again rejected, Applicant respectfully requests that the Examiner provide qualifying references under 35 U.S.C. 102 and 103 that disclose the limitations which the Examiner relied on an Official Notice for. Further, there is no motivation or suggestion in Yang to modify it as the Examiner suggests. Yang does not disclose links for direct access to control programs in appliances. As such, there is no reason or motivation to include hyper-text links in Yang. Further, in Yang, there is no mention, motivation or suggestion about Internet or HTTP protocol or suggestion to utilize such protocols in the remote control. For at least these reasons, rejection of Claims 4, 5, 13, 14, 23 and 24 should be withdrawn.

Below Applicant further responds to the Examiner's response to Applicant's arguments. In col. 8, lines 10-17 (relied on by the Examiner), Yang does not disclose obtaining device information from devices for user interaction with the devices, and then generating a top page that includes links for direct access to user interface information in the appliances, such that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance, as claimed.

In col. 8, lines 10-17, Yang states: "In the network application described above, and for any application where multiple appliances to be controlled are located in the same room, the remote control device could receive an interface control signal for each of the appliances on the

network or in the room. The software could provide for a separate icon to be displayed in message display window 142 for each appliance that is available to be controlled.” Accordingly, in Yang the software in memory 120 of the remote control 100 provides a separate icon in display 142 for each available appliance, but does not obtain the icon from the appliance. Further, links in the top page as claimed, are different from icons in Yang. Just because Yang displays appliance icons, it does not mean that Yang discloses links for direct access to user interface information in the appliances. Yang does not disclose that: “the top page user interface description including one or more references associated with the device information in each of said devices currently connected to the network, such that each reference in the top page user interface description includes at least one electronic link providing direct access from the top page user interface description to said device information contained in said devices currently connected to the network,” as required by Claim 1. The Examiner has failed to establish how icons in Yang provide direct access from display 142 to information contained in appliances.

Yang does not disclose that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance, as claimed. In col. 8, lines (19-24), Yang states: “The selection of the icon would provide a control signal to the functions interface and the functions interface would then access the control software for that appliance from memory and configure the user interface function control panel so that it would be configured to control the

appliance selected.” Clearly, In Yang, the remote 100 accesses the memory 120 in the remote 100, not the appliances.

Further, Yang does not disclose: “generating a top page user interface description based at least on the obtained information,” as claimed. Yang (col. 8, lines 10-17), does not disclose that Yang generates a user interface based on the obtained information from the appliances. Rather, Yang states: “... the remote control device could receive an interface control signal for each of the appliances on the network or in the room. The software could provide for a separate icon to be displayed in message display window 142 for each appliance that is available to be controlled.” Clearly, Yang does not disclose that the software provides a separate icon for each appliance based on the information in an interface control signal received for each of the appliances.

Further, in col. 4, lines 32-38 (relied on by the Examiner), Yang states: “In utilizing the embodiment of FIG. 2A for the user interface 140, VCR 200 would download programming software to remote control device 100 that would be utilized by the remote control device to control the functions of the VCR. The programming software is downloaded to remote control device 100 over data link 150. Data interface 110 would receive the downloaded programming software and store the software in memory 120.” However, Yang, does not disclose the top page user interface description includes a link providing direct access from the top page user interface description to said device information contained in said devices currently connected to the

network, as claimed. The Examiner has failed to establish how icons in Yang provide direct access from display 142 to information contained in appliances. Further, Yang does not disclose that selection of an icon on display 142 causes control functions to be downloaded from an appliance to the memory 120 of remote 100.

Further, Yang does not disclose that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance, as claimed. In col. 8, lines (19-24), Yang states: "The selection of the icon would provide a control signal to the functions interface and the functions interface would then access the control software for that appliance from memory and configure the user interface function control panel so that it would be configured to control the appliance selected." Clearly, in Yang, the remote 100 accesses the memory 120 in the remote, not the appliances.

Yang does not disclose that the top page user interface description includes one or more electronic links providing direct access from the top page user interface description to device information contained in one or more associated devices currently connected to the network, as claimed. The Examiner has failed to establish how icons in Yang provide direct access from display 142 to information contained in appliances.

Further, Yang does not disclose that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance, as claimed. Indeed, in Yang, the remote 100 accesses the memory 120 in the remote, not the appliances. In col. 8, lines 19-24, Yang states: "The selection of the icon would provide a control signal to the functions interface and the functions interface would then access the control software for that appliance from memory and configure the user interface function control panel so that it would be configured to control the appliance selected." Clearly, in Yang, the remote 100 accesses the memory 120 in the remote, not the appliances.

There is no disclosure in Yang of a case where the remote control 100 presents to the user a top page with links for direct access to control programs contained in the appliances 150 themselves, wherein when the user selects an appliance link in the top page, the remote control 100 downloads the corresponding control program from the appliance itself, as claimed herein.

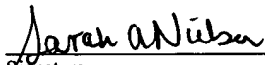
Yang does not disclose associating a hyper-text link with the device information in each of said devices currently connected to the network, such that each hyper-text link provides access from the top page user interface description to the device information in a corresponding device, as claimed herein. Yang does not disclose that device information in each device comprises an HTML page for user interaction with and/or control of that device, as claimed herein. There is no motivation or suggestion in Yang to modify it as the Examiner suggests. Further, as

discussed above, Yang does not disclose links for direct access to control programs in appliances. Yang does not disclose that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance, as claimed. Indeed, in Yang, the remote 100 accesses the memory 120 in the remote, not the appliances.

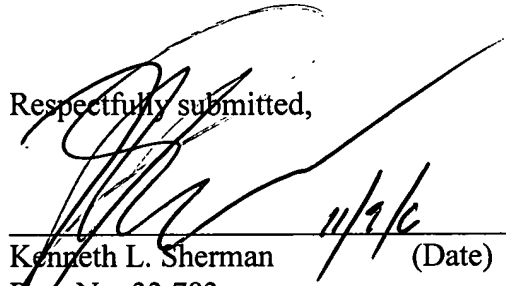
As such, there is no reason or motivation to include hyper-text links in Yang. Further, in Yang, there is no mention, motivation or suggestion about Internet or HTTP protocol or suggestion to utilize such protocols in the remote control. Indeed, Yang does not disclose a user interface description that includes links to appliances, wherein when the link for a device is selected by the user, the selected link is used to access control program information stored in the device to obtain the user interface for the selected device for the user to control the device. There is no top page user interface description in Yang with links for access to appliances, wherein when the link is selected by the user, the link is used to access the appliance and access the user interface (i.e., control program) for the appliance. Rather, in Yang, an “interface control signal” is used to access control program of the appliance that is already stored in the remote control memory.

CONCLUSION

For at least these reasons, and other reasons, it is respectfully submitted that all of the claims are allowable. Applicant hereby reserves the right to present further arguments and/or amendments in support of allowance of the claims. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

<u>Certificate of Mailing</u>	
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By: Sarah A. Nielsen	
 Signature	
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Respectfully submitted,


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